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OPSI RESOLUTION # 2013-2

OPSI Resolution Regarding Target System Restoration Timelines

WHEREAS, retail consumers legitimately reject lengthy power outages as a threat to their physical and financial well-being; and

WHEREAS, public officials reject lengthy power outages as a threat to the orderly functioning of their communities; and

WHEREAS, the Energy Policy Act of 2005 made NERC's reliability standards mandatory and instituted financial penalties for noncompliance as a result of the many harms caused by the 2003 blackout of portions of the eastern interconnection; and

WHEREAS, NERC reliability standard EOP-005-1 requires transmission operators such as PJM to maintain restoration plans to reestablish the electric system in a stable and orderly manner in the event of a partial or total shutdown of the system;¹ and

WHEREAS, PJM and its transmission owning members have agreed to various assignments and sharing of duties to ensure compliance with NERC's reliability standards, and those assignments are documented in the Transmission Owner/Transmission Operator (TO/TOP) Matrix; and

WHEREAS, the TO/TOP Matrix reflects that each transmission owning member of PJM is responsible to develop and maintain "a restoration plan to reestablish its electric system in a stable and orderly manner in the event of a partial or total shutdown of its system"; and

WHEREAS, *PJM Manual 36: System Restoration* previously stated that "the PJM RTO has the capability of being completely restored from a shutdown state within 24 hours. However, the majority of the PJM RTO (80%) is capable of being restored within 16 hours. The Transmission Owners' bulk power transmission systems are capable of being restored within 10 hours"; and

WHEREAS, PJM Manual 36: System Restoration was amended at the December 20, 2012 Markets and Reliability Committee Meeting to remove the standard quoted above and to add

¹ See NERC standard EOP-005. <http://www.nerc.com/files/EOP-005-1.pdf>

the statement, “ A system assessment following a blackout is a critical first step in identifying an overall system restoration time. While PJM and its Members work to restore the integrity to the interconnection as quickly and safely as possible, there are a wide variety of factors that can influence a system restoration. Following a system assessment, estimates of restoration times of the Bulk Electric System (BES) transmission and customer load restoration estimates can more accurately be made “;²and

WHEREAS, *PJM Manual 12: Balancing Operations* currently assumes that “enough black start generation will be deemed critical to facilitate the goal of restoring the majority of the PJM RTO (80% of load) in 16 hours”³; and

WHEREAS, restoration target times provide PJM the rationale for the quantity and location of black start generation resources that are needed to assure system restoration occurs with all due haste following a blackout; and

WHEREAS, restoration target times provide each transmission owning member of PJM the rationale for transmission upgrades and restoration plans that are needed in order to restore their portion of the electric system with all due haste following a blackout; and

Now, therefore, be it resolved, that the OPSI member commissions urge PJM to reinstate a time-based restoration target and work with its generation and transmission owning members to jointly develop black start and system restoration plan(s) that ensure that black start generation and transmission resources are available in the quantities and locations necessary to restore the bulk electric system with all due haste and within a specified time following a system blackout, assuming a minimal amount of physical damage to the bulk electric system.⁴

²See page 16 of PJM Manual 36, . <http://www.pjm.com/~media/documents/manuals/m36.ashx>

³ See page 57 of PJM Manual 12. <http://www.pjm.com/~media/documents/manuals/m12.ashx>

⁴ In other words, the target restoration time would not apply if electric generation and transmission facilities had experienced widespread damage.